

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GRAHAM CHASE ROBINSON,

Plaintiff,

- against -

ROBERT DE NIRO and
CANAL PRODUCTIONS, INC.,

Defendants.

Case No.: 1:19-cv-09156 (LJL) (KHP)

**DECLARATION OF
GREGORY R. BENNETT
IN FURTHER SUPPORT
OF DEFENDANTS'
MOTION FOR SANCTIONS**

Gregory R. Bennett, an attorney duly admitted to practice before the United States District Court, Southern District of New York, declares pursuant to 28 U.S.C. §1746:

1. I am a Partner at Traub Lieberman Straus & Shrewsberry, LLP, attorneys for Defendants Robert De Niro and Canal Productions, Inc. (collectively, “Defendants”). I submit this declaration in further support of Defendants’ motion seeking an order, pursuant to Fed. R. Civ. P. 11, 28 U.S.C. §1927, and the Court’s inherent power, imposing sanctions on Plaintiff and her counsel as a result of their commencement of frivolous (i) equal pay claims under federal and state law (the “EPA Claims”), (ii) a claim seeking overtime compensation under the New York Labor Law (the “OT Claim”) (collectively, the “Frivolous Claims”), and (iii) for maintaining the Frivolous Claims without any colorable basis in law or fact throughout the discovery phase of this action, along with such other and further relief as the Court may find appropriate.

2. Annexed here as **Exhibit A** are true and correct copies of certain resumes plaintiff, Graham Chase Robinson (“Plaintiff”), penned personally and produced in this action, which were produced by Plaintiff bearing bates-stamped nos. ROBINSON00002140-2143.

3. Annexed here as **Exhibit B** is an audio recording produced by Plaintiff bearing bates-stamped no. ROBINSON00007209.

4. Annexed here as **Exhibit C** is an audio recording produced by Plaintiff bearing bates-stamped no. ROBINSON00007209.

5. Annexed here as **Exhibit D** is an audio recording produced by Plaintiff bearing bates-stamped no. ROBINSON00007199.

6. Annexed here collectively as **Exhibit E** is a compilation of five redacted examples of contracts where Dan Harvey is identified as Mr. De Niro's personal trainer and the terms applicable to his engagement, which has been bates-stamped nos. CANAL_005203-0052713.

7. Annexed here as **Exhibit F** is a true and correct copy of a resume and bio, which Plaintiff authored to describe her job duties, and produced by Plaintiff bearing bates-stamped no. ROBINSON00005247.

8. Annexed here as **Exhibit G** is an audio recording produced by Plaintiff bearing bates-stamped no. ROBINSON00007214.

9. Annexed here as **Exhibit H** is an audio recording produced by Plaintiff bearing bates-stamped no. ROBINSON00007186.

10. Annexed here as **Exhibit I** is an audio recording produced by Plaintiff bearing bates-stamped no. ROBINSON00007209.

11. Annexed here as **Exhibit J** is an audio recording produced by Plaintiff bearing bates-stamped no. ROBINSON00007186.

12. Annexed here as **Exhibit K** is an audio recording produced by Plaintiff bearing bates-stamped no. ROBINSON00007199.

13. Annexed here as **Exhibit L** is an audio recording produced by Plaintiff bearing bates-stamped no. ROBINSON00007175.

14. Annexed here as **Exhibit M** is an audio recording produced by Plaintiff bearing bates-stamped no. ROBINSON00007185.

15. Annexed here as **Exhibit N** is a true and correct copy of an email exchange between Plaintiff and Chris Young, which was produced by Plaintiff bearing bates-stamped nos. ROBINSON00004942-4956.

16. Defendants respectfully submit that the Frivolous Claims are without merit, should be dismissed in their entirety, and the imposition of sanctions is warranted.

Dated: Hawthorne, New York
May 20, 2022

Gregory R. Bennett

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